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VIA ELECTRONIC FILING

The Honorable Ona T. Wang  
U.S. District Court, S.D.N.Y.  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

Re: In re Application of Sukhbaatar Batbold, 21-mc-00218-RA (S.D.N.Y.)

Dear Judge Wang:

We respectfully submit this letter on behalf of Petitioner Sukhbaatar Batbold to inform the Court of a recent development in the foreign proceeding pending against Mr. Batbold in Hong Kong.

Pursuant to the Court's July 12, 2022 and July 14, 2022 Orders, Dkts. 123, 126, Mr. Batbold filed on July 15, 2022 a chart detailing the status of each of the foreign proceedings pending against him, Dkt. 128. As an update on the Hong Kong proceeding, Mr. Batbold filed an application before the High Court on August 30, 2022 to discharge the injunction entered against him in that proceeding. Mr. Batbold seeks discharge of the Hong Kong injunction because, among other reasons, the Hong Kong proceeding was commenced and pursued without authority from the purported plaintiffs. Although King & Spalding LLP's co-counsel in the Hong Kong proceeding has withdrawn as counsel in that action, Dkt. 128-1 at 3, Mr. Batbold seeks discharge of the Hong Kong injunction to fully terminate that proceeding against him. Unless and until Mr. Batbold's discharge application is granted, the Hong Kong proceeding remains pending against Mr. Batbold, and the status of the remaining litigations is unchanged. Dkts. 128, 139. The discovery Mr. Batbold seeks from Respondent K2 Integrity Inc. though this Section 1782 application remains urgently needed.

We thank the Court for its kind consideration.

Respectfully submitted,

/s/ Orin Snyder

Orin Snyder

Counsel for Petitioner

cc: All Counsel of Record